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IN THE UNITED STATES PATENT & TRADEMARK OFFICE

IN RE APPLICATION OF	:
FUMIHIKO SATOU	: EXAMINER: PARKER, BRANDON
SERIAL NO: 10/670,283	:
FILED: SEPTEMBER 26, 2003	: GROUP ART UNIT: 2174
FOR: USER INTERFACE APPARATUS	:

REPLY BRIEF UNDER 37 C.F.R. § 41.41

COMMISSIONER FOR PATENTS
ALEXANDRIA, VIRGINIA 22313

SIR:

This Reply Brief is presented in order to point out and respond to errors in the Examiner's Answer (hereinafter EA) relating to the misinterpretations of the Bertram reference and Claims 17 and 18 under appeal.

I. Transferring Content of Operation Menu

Claims 17 and 18 require the claimed user interface system to display an operation menu and to "transfer contents of said [displayed] operation menu based on an operation input received in response to the operation menu being selected." In response to the arguments presented in the Appeal Brief (hereinafter AB) regarding the above noted claimed features, the EA relies on col. 1, ll. 49-51 and col. 7, ll. 26-44 of Bertram.

Col. 1, ll. 49-51 of Bertram describes that a browser interface may have a menu bar or tool bar whose contents can be changed, removed or arranged differently for customization. Therefore, this portion of Bertram merely describes a method of altering a user interface by

arranging the interface differently, but fails to disclose transferring "contents of said [displayed] operation menu based on an operation input received in response to the operation menu being selected."

The EA further cites col. 7, ll. 26-44 of Bertram and asserts that the reference "discloses that a user interface can be switched (i.e. transferred) automatically in response to the receipt of a communicated desire (i.e. input received) to change the interface based on data content or format or it can be switched (i.e. transferred) by the specific request by the user."

In particular, col. 7, ll. 26-35 of Bertram states:

> In the invention, any user interface is changed by simply removing the currently active user interface and control code being executed in the processor and replacing it with a new user interface and control code without affecting the data being displayed. The user interface can be switched automatically in response to the receipt of a communicated desire to change the interface based on data content or format or it can be switched by the specific request of the user.

As further described at col. 7, lines 36-44, of Bertram:

> Automated user interface changes are implemented in the invention by providing software routines to respond to changes in data content or format from a data source such as a host, a server or a received URL content from a browser. To enable this function, each user interface is registered with a user interface selection control facility provided by the invention which is configured to detect changes in received content which correlate with factors that are associated with given user interfaces.

Thus, to the extent that Bertram describes contents of an "operation menu" being transferred "based on an operation input received in response to the operation menu being selected," it is relative to the user interface change control facility selecting the new user interface in response to the above-noted automatic detection or in response to the above-noted user selection by having the new user interface (newly loaded or already loaded) replace the presently running user interface. This received new content transition or the user requested interface change transition is not seen to be reasonably readable on the language of

Claims 17 and 18 that require displaying an operation menu and transferring contents of this displayed operation menu (not other data contents) based on an operation input received in response to the operation menu being selected (not receipt of an interface change instruction itself).

II. Executing a Process Requirement

Claims 17 and 18 recite that the claimed processor must "execute a process requirement corresponding to the operation input." In rebutting the arguments directed to this claimed feature, the EA relies on col. 3, ll. 49-53 of Bertram.

This cited portion of Bertram describes that "each received URL has data contents that are processed and presented by the browser either through use of its own facilities or through use of facilities present through the operating where it is running..." Thus, this cited portion of Bertram describes that the information corresponding to a received URL is processed either through the browser, or the operating system supporting the browser. The EA then appears to equate the description in Bertram of "received URL has data contents that are processed" to the claimed feature of "executing a process requirement corresponding to the operation input." Claims 17 and 18, however, further recite that the "operation input [is] received in response to the operation menu being selected." Therefore, it is the result of the menu selection that "a process requirement [is executed] corresponding to the operation input." Bertram, on the other hand, merely describes that the contents of a received URL are processed when the URL is received at the browser. The receipt of a URL at the browser is not an "operation input" as defined in Claims 17 and 18, and those of ordinary skill in the art at the time of the invention would understand that a URL is not necessarily received in response to an "operation input."

Therefore, the operation of Bertram, even as characterized in the EA, does not anticipate the claimed feature of "executing a process requirement corresponding to the operation input," as recited in Claims 17 and 18.

III. Group of Independent Software Objects

Claims 17 and 18 further require there to be "a group of independent software objects" that are "to display the operation menu and to transfer the contents of the operation menu in response to the operation menu being selected," with this transfer of the contents of the operation menu being controlled by "a menu flow software object," while control of "processing of the operation input by the processor to create, change, and delete the input operation" is provided by "an operation software object separate from the menu flow software object" that functions "in cooperation with the menu flow software object to provide this "control."

As an initial matter, Appellants submit that the EA fails to address the interrelationship between the "group of independent software objects" as required in Claims 17 and 18. Claims 17 and 18 recite, in part:

> a group of independent software objects configured to display the operation menu and to transfer the contents of said operation menu in response to the operation menu being selected, said group of independent software objects including:
> a menu flow software object configured to control the transfer of the contents of the operation menu; and
> an operation software object separate from the menu flow software object and functioning in cooperation with the menu flow software object to control processing of the operation input by the processor and to create, change, and delete the input operation.

In addressing the features outlined above, the EA again relies on col. 1, ll. 49-51 and col. 7, ll. 26-44 Bertram. In characterizing col. 7, ll. 26-35 of Bertram, the EA asserts that the reference "discloses any user interface is changed by simply removing the current active user interface and control code being executed on the processor and replacing it with a new user

interface and control code without affecting the data being displayed." The EA further asserts that this cited portion of Bertram "discloses that a user interface can be switched (i.e. transferred) automatically in response to the receipt of a communicated desire (i.e. input received) to change the interface based on data content or format or it can be switched (i.e. transferred) by the specific request by the user."

However, none of these cited portions of Bertram seem to relate to the "group of independent software objects" as recited in Claims 17 and 18. More specifically, even if Bertram were to be interpreted as set forth in the EA, the reference still fails to anticipate the features of Claims 17 and 18, which require there to be "a group of independent software objects" that are "to display the operation menu and to transfer the contents of the operation menu in response to the operation menu being selected," with this transfer of the contents of the operation menu being controlled by "a menu flow software object," while control of "processing of the operation input by the processor to create, change, and delete the input operation" is provided by "an operation software object separate from the menu flow software object" that functions "in cooperation with the menu flow software object to provide this "control."

Further, the EA fails to address the specific arguments regarding the above noted claimed features recited in Claims 17 and 18 set forth in the AB.

VI. Conclusion

The EA primarily relies on the features at col. 1, ll. 49-51 and col. 7, ll. 26-44 of Bertram in rebutting the arguments presented in the AB. Bertram, however, at no point, discloses the features recited in independent Claims 17 and 18, as outlined herein and in the previously submitted AB.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
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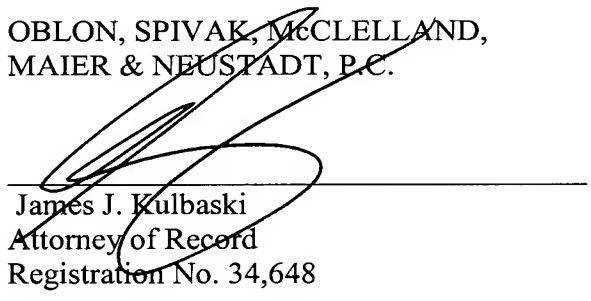

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